

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ALLISON COOK,

Plaintiff,

V.

THE PROVIDENT LIFE AND CASUALTY  
INSURANCE COMPANY and THE UNUM  
GROUP.,

Defendants.

- X

: Civil Action No.: 07 cv 9421  
: (VM)(DFE)

**: PROPOSED JOINT DISCOVERY**  
**: PLAN**

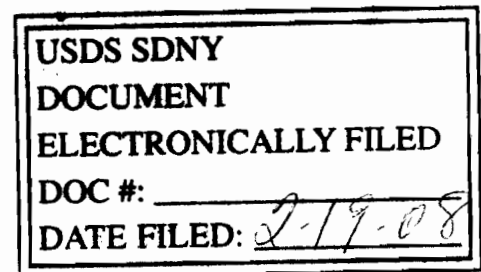
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Counsel for the parties herein submit, pursuant to Fed. R. Civ. P. 26(f), the following proposed joint discovery plan in anticipation of the scheduling conference to occur on February 15, 2008 at 9:30 a.m.

1. Information concerning the attorneys appearing in this civil action are as follows:

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Attorneys for Defendant, The Provident Life and Casualty Insurance  
Company and The Unum Group

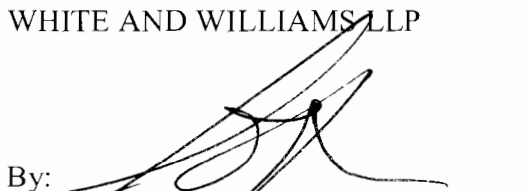
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Attorneys for Plaintiff, Allison Cook.




2. The parties have not conducted formal discovery.
3. After conferring with counsel for the parties, the following Scheduling Order is proposed pursuant to Fed. R. Civ. P. 25(f), and Fed. R. Civ. P. 16(b):
  - a. The Parties are participating in private mediation.;
  - b. The parties shall serve Rule 26 Disclosures and plaintiff shall furnish medical authorizations by **April 25, 2008**:
    1. First Request for production of documents and interrogatories by **May 9, 2008**;
    2. Request for admissions may be made at any time up to 30 days before the close of discovery.
  - c. The parties shall respond to first request for production of documents and interrogatories by **June 9, 2008**;
  - d. The depositions of all parties and fact witnesses, including experts, shall be completed by **September 12, 2008**;
  - e. Plaintiff shall designate experts and serve all reports pursuant to Fed. R. Civ. P. 26(a)(2) by **October 17, 2008**;
  - f. Defendant shall designate experts and serve all reports pursuant to Fed. R. Civ. P. 26(a)(2) by **November 4, 2008**;
  - g. Motions to add new parties or new claims to be filed by **September 19, 2008**;
  - h. All discovery, including expert depositions, shall be concluded by **December 22, 2008**;
  - i. All dispositive motions, including summary judgment motions, shall be filed by **January 19, 2009**;
  - j. If neither party files a dispositive motion or a motion for summary judgment by **January 19, 2009**, either party may request the court to schedule a final pretrial conference pursuant to Fed. R. Civ. P. 16(d)

WHITE AND WILLIAMS LLP

By:

  
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By:

  
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Date: February 15, 2008

*Next conference 9-19-09 at 10:00 a.m.*  
**SO ORDERED:**



Honorable, Victor Marrero